

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**

PERMIAN BASIN PETROLEUM  
ASSOCIATION, NATIONAL CATTLEMEN'S  
BEEF ASSOCIATION, TEXAS  
CATTLEFEEDER'S ASSOCIATION,  
KANSAS LIVESTOCK ASSOCIATION,  
OKLAHOMA CATTLEMEN'S  
ASSOCIATION, AND NEW MEXICO  
CATTLE GROWER'S ASSOCIATION,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE INTERIOR;  
U.S. FISH AND WILDLIFE SERVICE;  
DEBRA HAALAND, in her official capacity as  
SECRETARY OF THE INTERIOR; MARTHA  
WILLIAMS, in her official capacity as  
DIRECTOR OF THE U.S. FISH AND  
WILDLIFE SERVICE,

Defendants.

Civil Action No. 7:23-cv-49

**DECLARATION OF ROBIN SCHNEIDER**

Pursuant to 28 U.S.C. 1746, I, Robin Schneider, hereby declare as follows:

1. My name is Robin Schneider. I live in Austin, Texas.
2. I am the Executive Director of Texas Campaign for the Environment ("TCE"),

based in the Austin office. I have worked for TCE since 1998 and have held the position of Executive Director since 2000.

3. TCE is a 501(c)(3) non-profit membership corporation organized under the laws of the State of Texas dedicated to informing and mobilizing Texans to protect their health, their

communities, and the environment. TCE works to promote strict enforcement of anti-pollution laws designed to stop or clean up air, water, and waste pollution.

4. As part of its mission, TCE engages its members and the public in advocating for the proper implementation of state and federal environmental laws, including the Clean Water Act, Clean Air Act, National Environmental Policy Act, and Endangered Species Act (“ESA”). The goal is to empower residents with the tools to fight against government and private industry actions impacting the Permian Gulf and other regions of Texas to reduce species, environmental and health harms.

5. In 2020, TCE broadened organizing efforts to address the other ways the fossil fuel industry contributes to pollution, climate change, and the destruction of our natural resources, including by contesting flaring permit applications and opposing financing and insuring of dangerous fossil fuel projects.

6. TCE is also fighting new and expanding crude oil and fracked gas exporting facilities across the Texas Gulf Coast. Limiting export will have a major impact on limiting fracking especially in the Permian Basin, Barnett Shale, and even in the Bakken in North Dakota.

7. TCE has approximately 20,000 Texas members, including members living in West Texas near the lesser prairie-chicken habitat. TCE and its members are very concerned about the impacts of development, including fossil fuel development, on efforts to conserve Texas’ native species and natural habitats.

8. TCE supports the listing of the lesser prairie-chicken under the ESA to help spark recovery efforts in its current and historic range. TCE and its members would be harmed if the bird were to be extirpated from Texas as it would deprive our members of the opportunity to view and appreciate them in the wild.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1<sup>st</sup> day of June, 2023.

A handwritten signature in black ink, appearing to read "Robin Schneider", is written over a horizontal line.

Robin Schneider